ESTTA Tracking number:

ESTTA386392 01/03/2011

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91196445
Party	Defendant Jonathan A. Naguit
Correspondence Address	RICK RUZ AMAURY CRUZ & ASSOCIATES 1560 LENOX AVENUE, SUITE 207 MIAMI BEACH, FL 33139 UNITED STATES rickruz@lexarian.com
Submission	Request to Withdraw as Attorney
Filer's Name	Rick Ruz, Esq.
Filer's e-mail	rickruz@yahoo.com
Signature	/Rick Ruz/
Date	01/03/2011
Attachments	Second Motion to withdraw PENSKEI MOTOR OIL.pdf (3 pages)(52071 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Trademark Application No. 77/883738 Filing Date: December 1, 2009 Mark: PENSKEI MOTOR OIL Published for Opposition: June 22, 2010	
DENCKE CYCTEMS INC)
PENSKE SYSTEMS, INC.,)
)
Opposer,)
V.) Opposition No. 91196445
JONATHAN A. NAGUIT,)
)
Applicant.)
)

In the matter of

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

Amaury Cruz & Associates and the undersigned show that they are attorneys for the Applicant JONATHAN A. NAGUIT in this action and states as follows.

- 1. Applicant has agreed to allow Amaury Cruz & Associates and the undersigned to withdraw as his attorneys in this action.
- 2. The undersigned has allowed time for employment of new counsel in this opposition.
- 3. All papers and property related to the proceedings and which Applicant may be entitled have been delivered to the Applicant via E-mail and/or US Mail.

4. There remains no fee advance to return to the Applicant as all previous fee

advances have been earned by the undersigned law firm and the Applicant has

fulfilled any and all financial obligations to the undersigned law firm.

5. Opposer's counsel has been consulted with respect to the relief sought in the

instant Motion and has agreed not to oppose it.

6. Applicant's contact information is 389 ARDEN AVE, UNIT # 1, Glendale, CA

91203.

Wherefore, Applicant and its counsel respectfully request that this Court enter an

order granting the instant motion and temporarily suspending the proceedings for a

period of thirty days to allow Applicant time to locate and retain new counsel.

Dated: January 3, 2010

Respectfully submitted,

AMAURY CRUZ & ASSOCIATES

1560 Lenox Avenue

Suite 207

Miami Beach, FL 33139

Telephone: (305) 604-2051

Facsimile: (305) 604-2011

By: ____/s/ Rick Ruz_

Rick Ruz, Esq.

Florida Bar No. 42090

rickruz@lexarian.com

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2010, a true and correct copy of the foregoing document was served via electronic mail and or First Class U.S. mail upon:

- Ryan C. Compton, Esq., DLA Piper, LLP, 500 Eighth Street, NW, Washington,
 DC 20004,ann.ford@dlapiper.com.
- Jonathan A. Naguit ("Applicant"), 389 ARDEN AVE, UNIT # 1, Glendale, CA 91203.